

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re	: Chapter 11 Case No.
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	: 08-13555 (JMP)
Debtors.	: (Jointly Administered)
	: :
	: :
-----X	

AFFIDAVIT AND DISCLOSURE STATEMENT OF  
GARETH DONALD TILLEY

CITY OF LONDON )  
COUNTRY OF THE UNITED KINGDOM )

GARETH DONALD TILLEY, being duly sworn, upon his oath, deposes and  
says:

1. I am a barrister, called to the Bar of England and Wales and a member of the barristers chambers known as Serle Court, 6 New Square, Lincoln's Inn, London WC2A 3QS, UK.
2. Lehman Brothers Holdings Inc. ("LBHI") and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (together, the "Debtors" and, collectively with their non-debtor affiliates, "Lehman"), have requested that I provide legal services, including the provision of legal advice, analysis of evidence and drafting of documents, to the Debtors with respect to matters of English law, in particular concerning possible claims the Debtors may have to assets currently held by affiliated Lehman entities in Europe, in support of those to be provided by Philip Jones QC and I have consented to provide such services.

3. I may have performed services in the past and may perform services in the future, in matters unrelated to these chapter 11 cases, for persons that are parties in interest in the Debtors' chapter 11 cases. As part of my customary practice, I am retained in cases, proceedings, and transactions involving many different parties, some of whom may represent or be claimants or employees of the Debtors, or other parties in interest in these chapter 11 cases. I do not perform services for any such person in connection with these chapter 11 cases. In addition, I do not have any relationship with any such person, their attorneys, or accountants that would be adverse to the Debtors or their estates.

4. I have not agreed to share and will not share any portion of the compensation to be received from the Debtors with any other person other than my regular expenses encountered with the administration of my barristers chambers.

5. Insofar as I have been able to ascertain, I do not hold or represent any interest adverse to the Debtors or their estates.

6. I have not provided any prepetition services to the Debtors.

7. If I should discover any facts bearing on the matters described herein, I will supplement the information contained in this Affidavit.<sup>1</sup>

By: 

Subscribed and sworn to before me  
the 11 day of November, 2009

  
Notary Public

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SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11 Case No.  
LEHMAN BROTHERS HOLDINGS INC., *et al.*, : 08-13555 (JMP)  
Debtors. : (Jointly Administered)  
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**RETENTION QUESTIONNAIRE**

TO BE COMPLETED BY PROFESSIONALS EMPLOYED BY LEHMAN  
BROTHERS HOLDINGS INC. OR ANY OF ITS DEBTOR AFFILIATES (collectively,  
the "Debtors")

DO NOT FILE THIS QUESTIONNAIRE WITH THE COURT.  
RETURN IT FOR FILING BY THE DEBTORS, TO:

Weil, Gotshal & Manges LLP  
767 Fifth Avenue  
New York, New York 10153  
Attn: Zaw Win  
Christopher Stauble

All questions **must** be answered. Please use "none," "not applicable," or "N/A," as  
appropriate. If more space is needed, please complete on a separate page and attach.

1. Name and address:

GARETH TILLEY

SERLE COURT

6 NEW SQUARE, LINCOLN'S INN

2. Date of retention: 26 OCTOBER 2009 \_\_\_\_\_
3. Type of services provided (accounting, legal, etc.):

LEGAL

4. Brief description of services to be provided:

LEGAL SERVICES, INCLUDING THE PROVISION OF LEGAL  
ADVICE, ANALYSIS OF EVIDENCE AND DRAFTING OF  
DOCUMENTS, TO THE DEBTORS WITH RESPECT TO MATTERS  
OF ENGLISH LAW, IN PARTICULAR CONCERNING POSSIBLE  
CLAIMS THE DEBTORS MAY HAVE TO ASSETS CURRENTLY  
HELD BY AFFILIATED LEHMAN ENTITIES IN EUROPE IN  
SUPPORT OF THOSE TO BE PROVIDED BY PHILIP JONES QC.

5. Arrangements for compensation (hourly, contingent, etc.)

HOURLY

- (a) Average hourly rate (if applicable):

£150

- (b) Estimated average monthly compensation based on prepetition  
retention (if firm was employed prepetition):

N/A

6. Prepetition claims against the Debtors held by the firm:

Amount of claim: \$0.00

Date claim arose: N/A

Source of Claim: N/A

7. Prepetition claims against the Debtors held individually by any member, associate, or professional employee of the firm:

Name: N/A \_\_\_\_\_

Status: N/A \_\_\_\_\_

Amount of Claim: \$0.00 \_\_\_\_\_

Date claim arose: N/A \_\_\_\_\_

Source of claim: N/A \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

8. Stock of the Debtors currently held by the firm:

Kind of shares: N/A \_\_\_\_\_

No. of shares: N/A \_\_\_\_\_

9. Stock of the Debtors currently held individually by any member, associate, or professional employee of the firm:

Name: N/A \_\_\_\_\_

Status: N/A \_\_\_\_\_

\_\_\_\_\_

Kind of shares: N/A \_\_\_\_\_

No. of shares: N/A \_\_\_\_\_

10. Disclose the nature and provide a brief description of any interest adverse to the Debtors or to their estates with respect to the matters on which the above-named firm is to be employed.

NONE \_\_\_\_\_

\_\_\_\_\_

11. Name of individual completing this form:

GARETH TILLEY